ORDER FOLLOWING MARCH 11, 2022 HEARING REGARDING SEARCHING MARK ZUCKERBERG AND SHERYL SANDBERG CUSTODIAL SOURCES

Case 3:18-md-02843-VC Document 881 Filed 03/15/22 Page 1 of 3

ORDER

Following the hearing held on March 11, 2022, regarding the parties' proposed search terms for the custodial sources of Mark Zuckerberg and Sheryl Sandberg, Special Master Garrie orders as follows.

Plaintiffs are to provide Facebook a list of the ten highest priority search strings for the custodial sources of Mark Zuckerberg and Sheryl Sandberg. Facebook is to run these ten search strings and analyze the results of each search string for richness. Facebook is to provide the richness analysis results and number of hits for these ten search strings to Plaintiffs and the Special Master on a rolling basis as the results are obtained. If any search strings generate an excessive number of hits, Facebook is to raise this with the Plaintiffs and the Special Master no later than March 16, 2022.

No later than March 22, 2022, Plaintiffs are to submit a revised set of the remaining search strings that include narrowed connectors. For example, the search string (friend* or fof* or naf*) w/20 (priva* or partner* or app* or api* or dev*) can be narrowed to (friend* or fof* or naf*) w/10 (priva* or partner* or app* or api* or dev*).

Facebook is to run the revised search strings and perform a richness analysis on a statistically significant sample of the hits for each search string. Facebook is to provide the results of these richness analyses to Plaintiffs and the Special Master on a rolling basis.

No later than April 1, 2022, Facebook will perform a richness analysis on a statistically significant sample of the results for the search strings Facebook has already run on the Mark Zuckerberg and Sheryl Sandberg custodial sources.

No later than March 22, 2022, Facebook is to identify the number of unique files that Facebook previously reviewed from the results of the search strings Facebook has already run on the Mark Zuckerberg and Sheryl Sandberg custodial sources. Facebook is also to identify the number of unique

files that hit on the search strings Facebook has already run on the Mark Zuckerberg and Sheryl Sandberg custodial sources that Facebook has previously produced from other custodians.

The deadline for production of responsive files from the Mark Zuckerberg and Sheryl Sandberg custodial sources will be determined after the richness analyses have been completed.

IT IS SO ORDERED.

March 14, 2022

Daniel Garrie

Discovery Special Master